

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:
DIRECT PURCHASER ACTIONS

**DECLARATION OF MICHAEL W.
SCARBOROUGH IN SUPPORT OF SDI
AND HITACHI DEFENDANTS' JOINT
OPPOSITION TO SHARP'S
ADMINISTRATIVE MOTION FOR CASE
MANAGEMENT CONFERENCE AND
RESPONSE TO NOVEMBER 20 ORDER
REQUESTING SUPPLEMENTAL
BRIEFING**

1 I, MICHAEL W. SCARBOROUGH, declare:

2 1. I am an attorney licensed to practice law in the State of California and in the United
3 States District Court for the Northern District of California. I am a partner with the firm of
4 Sheppard, Mullin, Richter and Hampton LLP, and counsel of record in this litigation for
5 Defendants Samsung SDI America, Inc., Samsung SDI Co., Ltd., Samsung SDI (Malaysia) Sdn.
6 Bhd., Samsung SDI Mexico S.A. de C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co.,
7 Ltd., and Tianjin Samsung SDI Co., Ltd. (the "SDI Defendants"). I submit this declaration in
8 support of the SDI and Hitachi Defendants' Joint Opposition to Direct Purchaser Class Member
9 Sharp's Administrative Motion for Case Management Conference and Response to the Court's
10 Order Requesting Supplemental Briefing. I make this declaration of my own personal knowledge,
11 and if called upon to do so, could and would testify competently to the facts contained herein.

12 2. As outside counsel, I was personally involved in the negotiation of the SDI
13 Defendants' settlement with the Direct Purchaser Plaintiffs in this litigation. The SDI Defendants
14 negotiated and agreed to this settlement with the understanding that there would be a single,
15 clearly defined opt out period, consistent with the approach followed for past settlements in this
16 litigation and the vast majority of class action settlements generally.

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18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct to the best of my knowledge. Executed on November 26, 2014 at
20 San Francisco, California.

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23 By /s/ Michael W. Scarborough
24 MICHAEL W. SCARBOROUGH
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